

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CENTRO PRESENTE, a membership organization, et al.,)	
)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:18-cv-10340
)	
DONALD J. TRUMP, President of the United States, in his official capacity, et al.,)	
)	
Defendants.)	
)	

DEFENDANTS' NOTICE OF SUPPLEMENTAL INFORMATION

Ahead of this Court's hearing on Plaintiffs' motion to compel discovery on the White House, Defendants hereby notify the Court of the current status of its production of documents from the Department of Homeland Security (DHS). As of the date of this filing, apart from documents withheld as privileged, Defendants estimate that they have produced from DHS's files approximately 11,000 documents (totaling approximately 120,000 pages).¹ Defendants' review is ongoing, and they anticipate substantial completion of their production by the end of the first week of May.

In addition, Defendants inform this Court that, after Defendants opposed Plaintiffs' motion to compel, the district court in the Eastern District of New York preliminarily enjoined the termination of Temporary Protected Status for Haiti. *See Saget v. Trump*, No. 18-cv-1599, ECF No. 155 (E.D.N.Y. April 11, 2019). As discussed in Defendant's opposition to Plaintiffs' motion

¹ Of the approximately 120,000 produced pages thus far, Defendants estimate that approximately 25,000 pages were included in more than one production. There are a variety of reasons for this overlap, including, for example, changes in redactions or documents being produced both as standalones and as parts of email families. In addition, of the approximately 11,000 produced documents, only a small percentage contain any redactions.

to compel White House discovery in this case, the plaintiffs in *Saget* had moved to compel White House discovery ahead of the trial conducted in that case. The district court, however, did not rule on the motion prior to issuing its 145-page opinion and issued the opinion without ordering discovery on the White House. *See id.*

Dated: April 16, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the Court's CM/ECF system will be served electronically on April 16, 2019, on the registered participants as identified on the NEF.

/s/ Adam D. Kirschner
ADAM D. KIRSCHNER